

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X,
HORACIO DAVID VELIZ MONTOYA, individually
and on behalf of others similarly situated,

Plaintiff,

-against-

PREMIUM MILLWORK, INC. (D/B/A PREMIUM
MILLWORK) and JULIO CUENCA,

Defendants.

-----X

**20-cv-02475
NOTICE OF MOTION
FOR DEFAULT
JUDGMENT**

NOTICE OF MOTION

Please take notice that, upon the annexed affirmation of Michael Faillace, and attached exhibits, and the affidavits of Plaintiff Horacio David Veliz Montoya and all prior papers and proceedings in this case, the Plaintiff, by counsel, will move the court, on such date as is set by the Court, pursuant to Fed. R. Civ. P. 55(b) (2) and Local Rule 55.2(b), for judgment by default against Defendants Premium Millwork, Inc. and Julio Cuenca.

Answering papers, if any, shall be served on the undersigned no later than fourteen days after service of the moving papers in accordance with Local Rule 6.1(b), or at such other time as the court may direct.

Dated: New York, New York
April 27, 2021

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: /s/ Clela Errington
Clela Errington Esq.
60 East 42nd Street, Suite 4510
New York, New York 10165
(212) 317-1200
Attorneys for Plaintiff